

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In Re)
)
Amendment of Section 73.202(b)) MM Docket _____
Table of Allotments,) RM- _____
FM Broadcast Stations)
Shelly and Island Park, Idaho)

To: Chief, Policy and Rules Division

PETITION FOR RULEMAKING

Woodcom, Inc. ("Woodcom"), by its attorney, hereby petitions for amendment of Section 73.202(b) of the Commission's Rules, Table of FM Allotments, to substitute Channel 292C1 for Channel 300C at Shelly, Idaho, and to substitute Channel 300C for Channel 293C at Island Park, Idaho.

Woodcom is the permittee of a new FM station authorized to operate on Channel 300C at Shelly, Idaho (BPH-950123MH). Woodcom desires to change the channel of its Shelly station from 300C to 292C1 so as to be able to construct the facilities for the station at an existing and developed antenna site which cannot be used for a station operating on Channel 300C due to spacing requirements. At the same time, Woodcom desires to downgrade its Shelly station to Class C1.

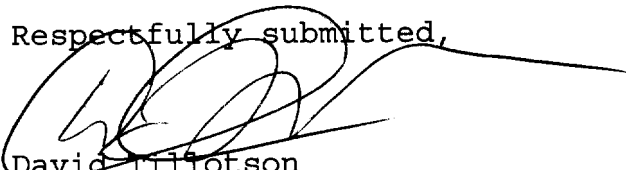
As shown in the attached Engineering Exhibit, Channel 292C1 can be allotted to Shelly, Idaho, in full compliance with the Commission's channel separation rules if Channel 300C is substituted for Channel 293C at Island Park, Idaho. The Engineering Agreement further shows that Channel 300C can be substituted for Channel 293C at Island Park in full compliance

with all applicable channel spacing requirements, and that Channel 300C can be utilized at Island Park, Idaho, from the transmitter site specified by the only applicant for the existing Island Park allotment. Accordingly, in order to accomodate Woodcom's proposal to substitute Channel 292C1 for Channel 300C at Shelly, Idaho, it is also proposed to substitute Channel 300C for Channel 293C at Island Park, Idaho.

Adoption of the allotment changes proposed herein will serve the public interest as they will enable Woodcom to construct the Shelly station at an existing and developed antenna site, thereby obviating the need for Woodcom to construct a new tall tower in the Shelly area with attendant environmental, air navigation, and esthetic impacts.

If this Petition is granted, Woodcom will file an application for modification of its construction permit for its Shelly station to specify operation on Channel 292C1 from a new transmitter site and will construct the Shelly station expeditiously upon grant of the such application.

Respectfully submitted,



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Attorney for Woodcom, Inc.

Date: June 11, 1997

DUPLICATE

Mueller Broadcast Design
613 S. La Grange Road
La Grange, Illinois 60525

**ENGINEERING EXHIBIT FOR
WOODCOM, INC.
BPH-950123MH
SHELLEY, IDAHO**

This engineering exhibit was prepared in support of a Petition for Rulemaking being filed by Woodcom, Inc. ("Woodcom"), permittee of (new-cp), Shelley, Idaho (BPH-950123MH) to amend 47 CFR 73.202(b) as follows:

Presently, Shelley, Idaho is allocated FM channel 300C. Woodcom proposes that channel 292C1 be substituted for channel 300C at Shelley. Woodcom will file FCC form 301 reflecting this change as soon as the allocation is modified.

The proposed channel substitution at Shelley requires that the allotment of channel 293C at Island Park, Idaho also be changed. Channel 300C would be available for use at Island Park at the on-file transmitter site of BPH-960123MJ, the first-come, first-serve application on file for the the Island Park allotment. Channel 300C is in full compliance with 47 CFR 73.207 from the site specified in the application.

It is desired to use an existing, developed antenna site for the Shelley, Idaho station. This would avoid construction of another tall tower in the area, which minimizes the air navigation, environmental and esthetic disruption which could occur with a new tower. Therefore, the petitioner is proposing a new reference point for the Shelley, Idaho channel:

43° 06' 45"N - 112°29' 34"W

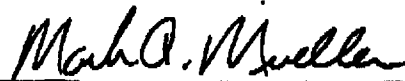
The attached tabulation illustrates the spacing situation for both the channel 292C1 allocation at Shelley, plus the channel 300C allocation at Island Park. Both are in full compliance with the relevant provisions of 47 CFR 73.207.

<u>Community of License</u>	<u>Present</u>	<u>Proposed</u>
Shelley, Idaho	300C	292C1
Island Park, Idaho	293C	300C

It is respectfully submitted that the substitution of channels as outlined herein is in the public interest and will result in a more efficient distribution of allocations, allow use of an established antenna site for the Shelley station, and expand broadcast service to the public by allowing the station to be constructed and operational in a short period of time.

This engineering exhibit was prepared by me and is true and correct to the best of my knowledge and belief.

June 3, 1997



Mark A. Mueller

TABLE E-1

FM Channel Search for: Shelley, Idaho
 Coordinates used: 43-06-45/112-29-34

NOTE: All distances are in Kilometers. Any stations which
 clear by more than 100 KM are not included in list.

Study for channel 292C (106.3 MHz) -----Spacing-----
CH# Call File Location Class Actual FCC Clearance
 238 (95.5 MHz)
 ** none clear by less than 100 kilometers **
 239 (95.7 MHz)
 ** none clear by less than 100 kilometers **
 289 (105.7 MHz)
 ** none clear by less than 100 kilometers **
 290 (105.9 MHz)
 ** none clear by less than 100 kilometers **
 291 (106.1 MHz)
 KOTB CP Evanston WY C3 235.2 176 59.2 @ 145.8°
 292 (106.3 MHz)
 KOTB LIC Evanston WY A 235.2 226 9.8 @ 145.8°
 293 (106.5 MHz)
 NEW APP Island Park ID C To Channel 300C
 KKBK CP Spanish Fork UT C 317.9 241 76.9 @ 171.4°
 294 (106.7 MHz)
 ALLOC ADD Twin Falls ID A 172.8 95 77.8 @ 249.9°
 295 (106.9 MHz)
 KLZXFM LIC Brigham City UT C 207.1 105 92.0 @ 178.6°

This channel can be used by a class C or lower station.

TABLE E-2

FM Channel Search for: Island Park, Idaho
Coordinates used: 44-10-31/111-25-47

NOTE: All distances are in Kilometers. Any stations which
clear by more than 200 KM are not included in list.

Study for channel 300-C (107.9 MHz) -----Spacing-----
CH# Call File Location Class Actual FCC Clearance
 246 (97.1 MHz) ** None clear by less than 200 kilometers **
 247 (97.3 MHz)
 KLCE LIC Blackfoot ID C 124.2 48 76.2 @ 233.2°
 297 (107.3 MHz)
 KAOX CP Kennerer WY A 272.8 95 177.8 @ 163.6°
 298 (107.5 MHz)
 ALLOC VAC Sun Valley ID C 240.4* 105 135.4 @ 258.2°
 NEW APP Billings MT C 267.5**105 162.5 @ 54.4°
 ALLOC VAC Billings MT C 291.6 105 186.6 @ 51.2°
 299 (107.7 MHz) ** None clear by less than 200 kilometers **
 300 (107.9 MHz)
 NEW CP Shelley ID C To Channel 292C1

This channel can be used by a class-C or lower station.

* Allocation reference point is closest to proposed. Four
applications on file are not shown.

** Application (one of three) is closest to proposed.

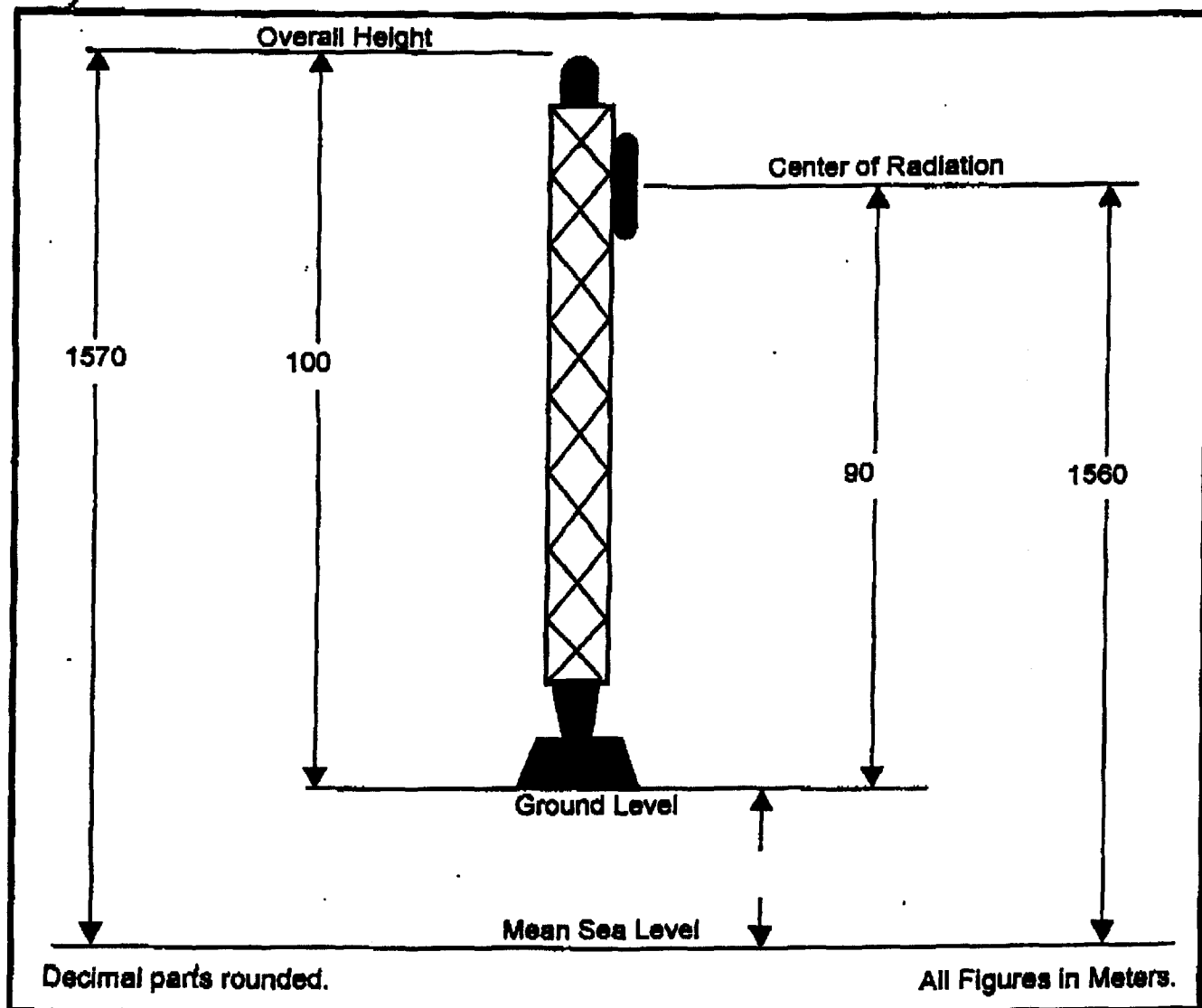
WOODCOM, INC.
MODIFICATION OF CONSTRUCTION PERMIT
CHANNEL 292 C1 (106.3 MHz), 100 KW ERP, 194 Meters HAAT
Shelley, Idaho
June 1997

Allocation Considerations

Channel 292C1 was allotted to Shelley, Idaho at the request of this applicant and was reserved for this station. The proposed site meets all current spacing requirements under 47 CFR 73.207 table A. The closest relevant stations are:

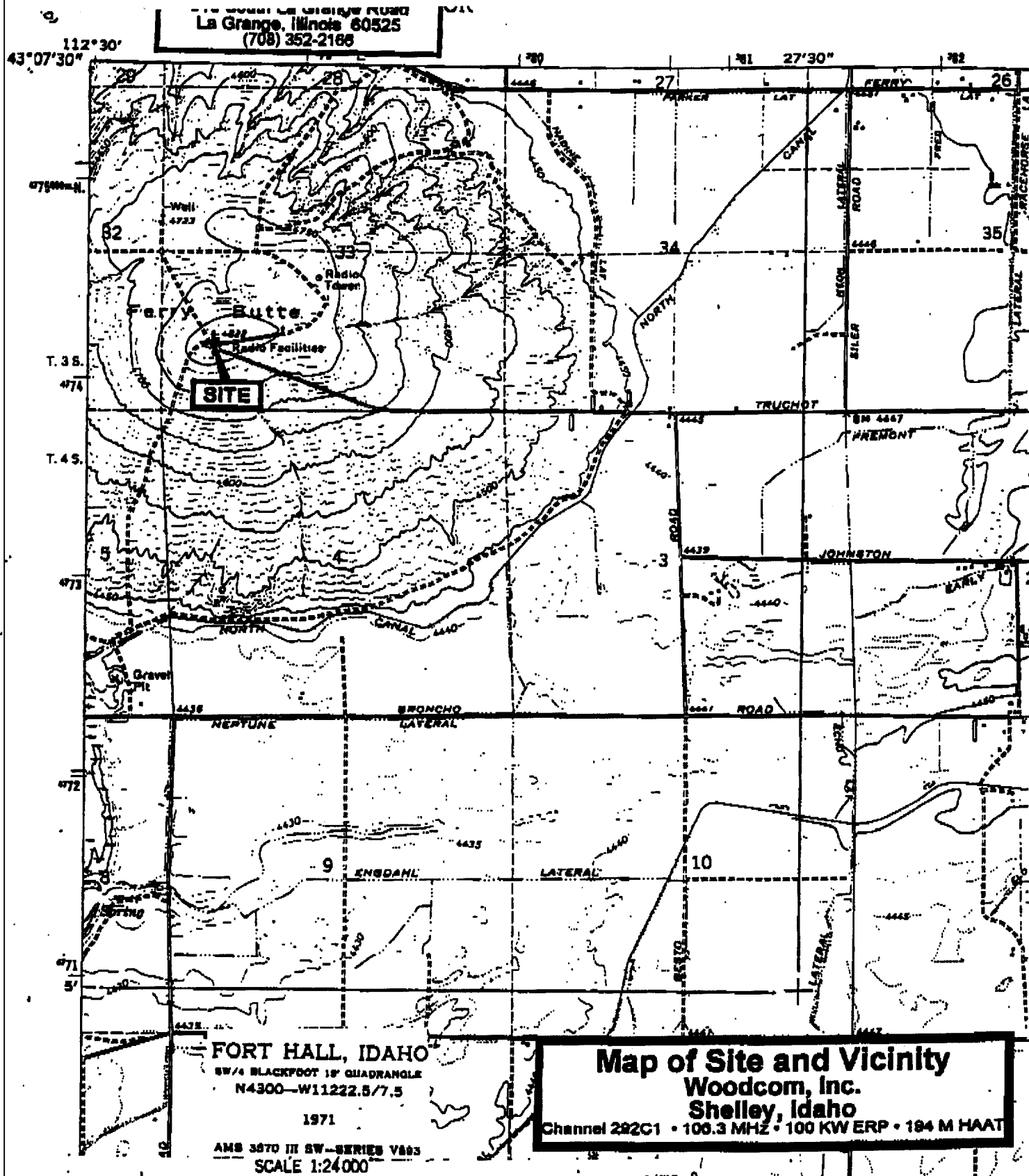
<u>CHANNEL</u>	<u>CALLSIGN</u>	<u>LOCATION</u>	<u>REQUIRED</u>	<u>ACTUAL</u>
238	No stations clear by less than 100 kilometers			
239	No stations clear by less than 100 kilometers			
289	No stations clear by less than 100 kilometers			
290	No stations clear by less than 100 kilometers.			
291 C3	KOTB (CP)	Evanston, WY	176 KM	235.2 KM
292 A	KOTB	Evanston, WY	226 KM	235.2 KM
293 C	KBKK (CP)	Spanish Fork, UT	241 KM	317.9 KM
294 A	(ADD)	Twin Falls, ID	95 KM	172.8 KM
295	No stations clear by less than 100 kilometers			

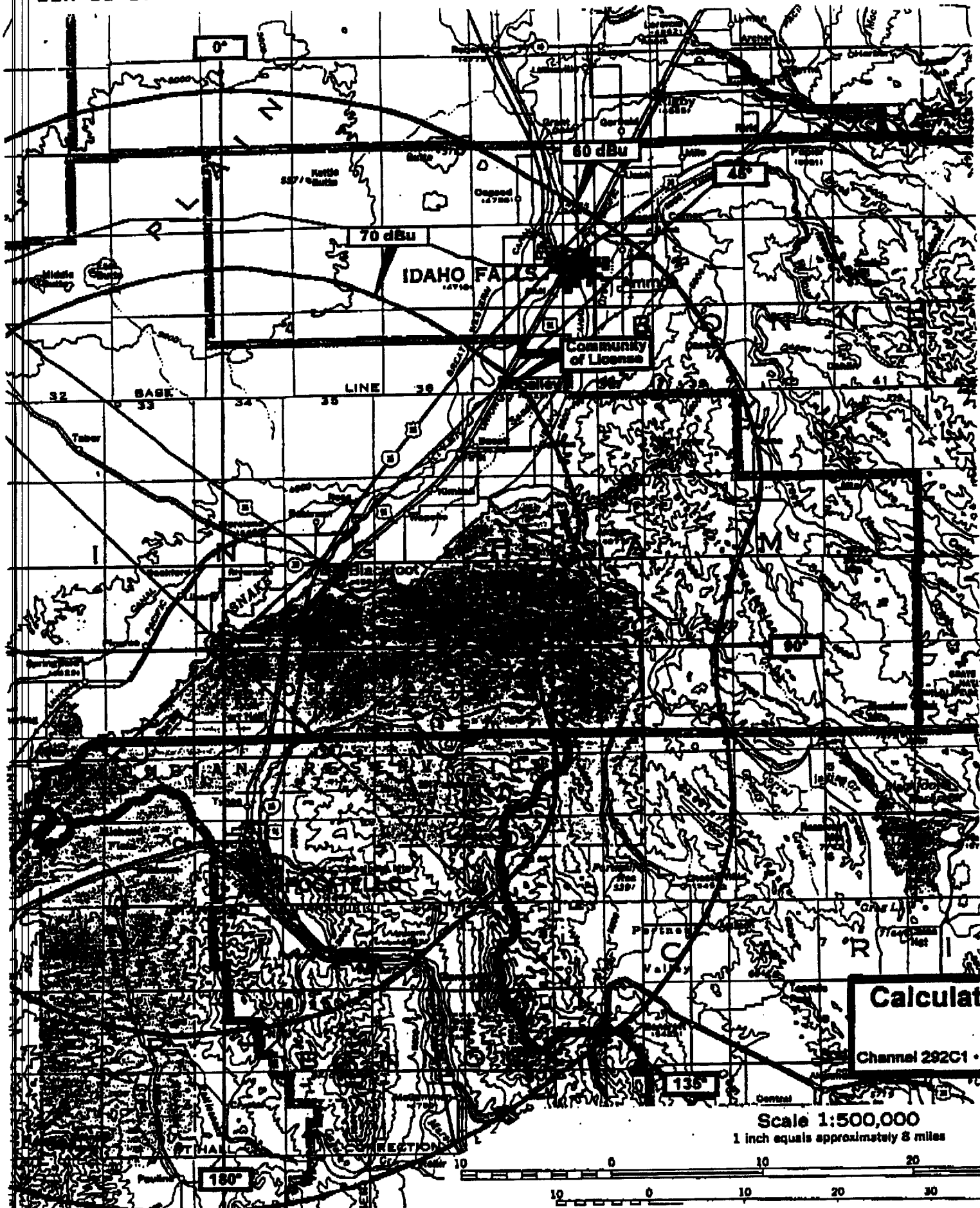
The proposed facility will provide the required 70 dBu service to 100% of Shelley, Idaho, the community of license.



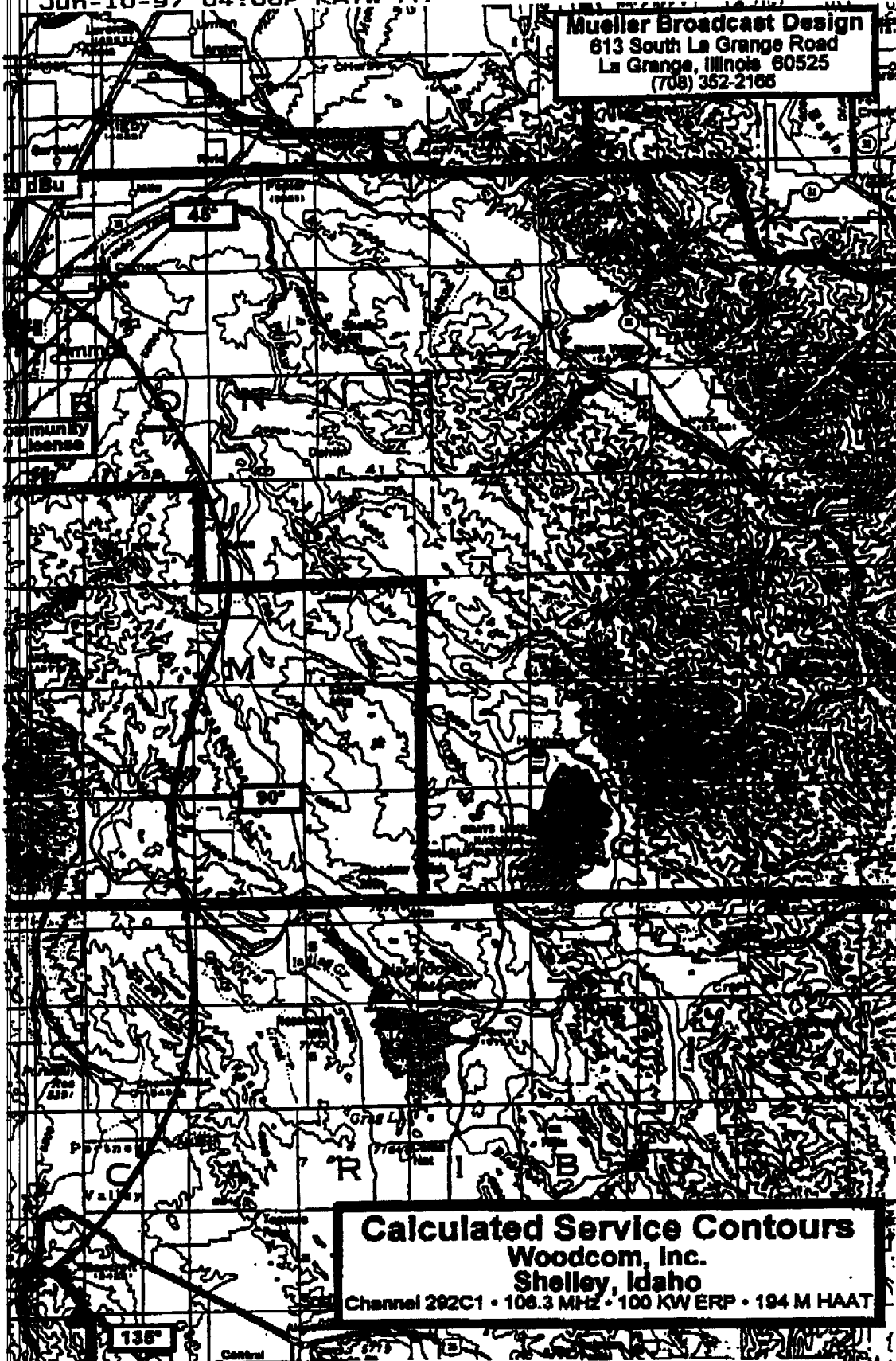
FM Vertical Plan
Woodcom, Inc.
Location: Shelley, Idaho Frequency: 106.3 MHz Channel: 292C1 Callsign: (new-cp) Date: June 1997
Mueller Broadcast Design 613 S. La Grange Rd. La Grange, Illinois 60525

Figure 1





Mueller Broadcast Design
613 South La Grange Road
La Grange, Illinois 60525
(708) 352-2166



Scale 1:500,000

1 inch equals approximately 8 miles

0 10 20 30 40 Miles

0 10 20 30 40 50 Kilometers

Figure 31